

IN THE DISTRICT COURT IN AND FOR PAYNE COUNTY
STATE OF OKLAHOMA

IN THE DISTRICT COURT OF
Payne County, Oklahoma

NOV 30 2016

By: LORI ALLEN, Court Clerk
Deputy

BLAKE D. JOHNSON,

Plaintiff,

vs.

JEFFREY E. MORRIS and
USAA INSURANCE AGENCY, INC.,
a Texas Corporation,

Defendants.

Case No: CJ-2016-538

PETITION

COMES NOW the Plaintiff, Blake D. Johnson, by and through his undersigned counsel of record, David T. Fletcher of the law offices of Coffey, Senger & McDaniel PLLC, and for his cause of action against Defendants, Jeffrey E. Morris and USAA Insurance Agency, Inc., alleges and states as follows:

1. That the complaint alleged herein occurred within Payne County, State of Oklahoma, and that this Court has jurisdiction over the parties and the subject matter herein.
2. The Plaintiff, Blake D. Johnson, is an individual who resided at 213 W. Elm Avenue, #133, City of Stillwater, County of Payne, State of Oklahoma.
3. The Defendant, Jeffrey E. Morris, is an individual who resided at 815 E. Will Rogers, City of Stillwater, County of Payne, State of Oklahoma.
4. That Defendant, USAA Insurance Agency, Inc., a Texas Corporation, and is a foreign insurance company doing business in the State of Oklahoma.

USAA is an insurance company licensed to do business in State of Oklahoma

EXHIBIT

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5. On December 1, 2014, at the intersection of Elm Avenue and Duck Street in the city of Stillwater, Payne County, State of Oklahoma, the Defendant Jeffrey Morris, was headed eastbound on Elm Avenue and while attempting to turn left on to Duck Street, drove his vehicle negligently and in a reckless and wanton manner striking the pedestrian Plaintiff, Blake Johnson, who was attempting to cross the street at the intersection.

6. As a direct result of the Defendant Morris' actions, Blake Johnson sustained injuries to his head, left hip, right and left hands and wrists.

7. As a result of these injuries, Blake Johnson has incurred medical expenses, lost wages, and pain both physical and mental.

WHEREFORE, Plaintiff prays for judgment against Defendant Morris in an amount in excess of \$75,000.00, together with attorney fees and costs of this action and any other relief the Court deems just and proper.

Respectfully Submitted,



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JOHN D. DOAK

Insurance Comm

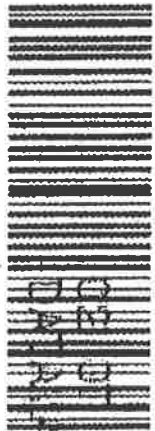
Oklahoma Insurance

5 Corporate Plaza

3625 NW 56th Street, Suite 100

Oklahoma City, OK 73112-4511

CERTIFIED MAIL



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FIRST-CLASS MAIL

NEOPOST

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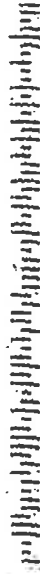
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USAA Insurance Agency, Inc.
9800 Fredericksburg Rd.
San Antonio, TX 78288



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